

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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KATHRYN TOWNSEND GRIFFIN, THE
ESTATE OF HELEN McDONALD, and
THE ESTATE CHERRIGALE
TOWNSEND,

Plaintiffs,

-against-

EDWARD CHRISTOPHER SHEERAN, *p/k/a* ED
SHEERAN, ATLANTIC RECORDING
CORPORATION *d/b/a* ATLANTIC RECORDS,
SONY/ATV MUSIC PUBLISHING, LLC,

Defendants.
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Docket No. 17-CV-5221 (LLS)

**DECLARATION OF
PATRICK R. FRANK
IN SUPPORT OF
PLAINTIFF'S FIRST
MOTION *IN LIMINE***

Patrick R. Frank declares that the following statements are true:

1. I am a partner at Frank & Rice, P.A., counsel for the Plaintiffs in this action. I have personal knowledge of, and am fully familiar with, the facts set forth in this Declaration. I respectfully submit this Declaration in opposition to defendants' motion for summary judgment, seeking to dismiss the Complaint of the plaintiffs, and to put before the Court certain documents and materials which are referenced in the accompanying papers.

2. Annexed as Exhibit 1 is a true and correct copy of the "Initial Disclosures of Defendants Edward Christopher Sheeran, Atlantic Recording Corporation and Sony/ATV Music Publishing, LLC", as served on October 20, 2017.

3. Annexed as Exhibit 2 is a true and correct copy of the "Amended Initial Disclosures of Defendants Edward Christopher Sheeran, Atlantic Recording Corporation and Sony/ATV Music Publishing, LLC", as served on February 6, 2018.

4. Annexed as Exhibit 3 is a true and correct copy of the “Second Amended Initial Disclosures of Defendants Edward Sheeran, Atlantic Recording Corporation and Sony/ATV Music Publishing, LLC”, as served on June 11, 2020.

Dated: September 26, 2020



PATRICK R. FRANK